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Making Insurance Companies Keep Their Promises

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May 20, 2025

VIA ECF

Honorable Joseph A. Marutollo.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: Government Employees Ins. Co. et al. v. Vladislav Stoyanovsky et al.
Docket No.: 1:24-cv-01017-PKC-JAM

Dear Judge Marutollo:

As the Court is aware, we represent Defendants, Dilsod Islamov (“Islamov”), Kianan Tariverdiev (“K. Tariverdiev”), Nazim Tariverdiev (“N. Tariverdiev”) along with Dmitriy Khavko (“Khavko”) (collectively the “Moving Defendants”).

On May 13, 2025, the Court held a conference/argument on Plaintiffs’ motion to compel certain discovery. The Court issued an Order that same day granting in part and denying in part Plaintiff’s motion. As relevant to the motion, the Court Ordered the Moving Defendants to produce copies of their 2021 and 2022 tax returns or identify the accountant(s) they used to prepare the returns by May 20, 2025.

The Moving Defendants request an adjournment of that deadline for an additional two (2) weeks until June 2, 2025 to comply with the Court’s Order so that they can locate the aforementioned documents and produce them to the parties herein. Plaintiff’s counsel has consented to a one-time two (2) week adjournment.

There should be no impact on any other dates in this matter. The parties are currently in the process of scheduling depositions for Khavko and the other non-indicted parties. The depositions of K. Tariverdiev, N. Tariverdiev, and Islamov are stayed by Your Honor’s Order. The fact discovery deadline of September 12, 2025 will not be impacted by this two (2) week extension. This is the first such request for an extension.

We thank the Court for its attention to this matter.

Respectfully Submitted.

SCHWARTZ, CONROY & HACK, PC

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